



Lennon,
Murphy &
Lennon, LLC

ATTORNEYS AT LAW

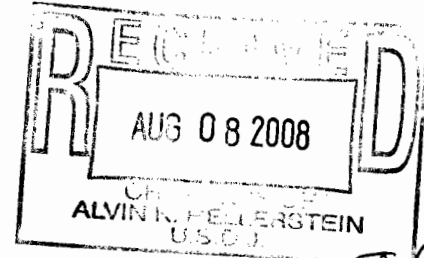
The GrayBar Building
420 Lexington Ave., Suite 300
New York, NY 10170
phone (212) 490-6050
fax (212) 490-6070
www.lenmur.com

Tide Mill Landing
2425 Post Rd, Suite 302
Southport, CT 06890
phone (203) 256-8600
fax (203) 256-8615
mail@lenmur.com

August 8, 2008

Via Facsimile (212) 805-7942

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007-1581



Re: National Ability S.A. v. Tinna Oils & Chemicals et. al.

Docket #: 07-09913-AKH

Our Ref: 07-1233

*The extension is granted
Defendant shall have until
9/22/08 & ready 8-11-08*

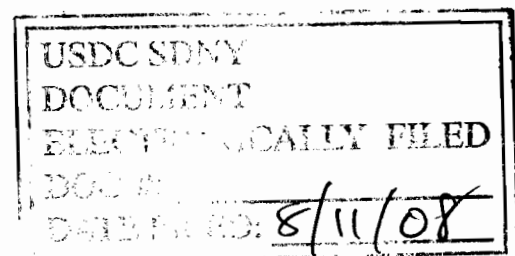
Dear Judge Hellerstein:

We are attorneys for the Plaintiff in this admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. We write with reference to the motion papers of ADM Cocoa Pte Limited and Tinna Oils and Chemicals Ltd. ("Defendants") served yesterday, August 7, 2008. In particular, we write to request an extension of time to submit Plaintiff's opposition papers for three weeks.

Defendants' motion papers are voluminous and reference legal proceedings held in both India and England. In order to prepare our opposition to Defendant's Motion to Dismiss, we will need to obtain opinions from both English and Indian Counsel on the issues raised in Defendants' Memorandum of Law and declarations. We further intend to prepare declarations for English and Indian Counsel attesting to the factual and legal bases for Plaintiff's claim and attachment application. This will require coordination with foreign counsel and our client, who are both overseas. An extension until September 12, 2008 (a three week extension) will allow us to prepare the necessary documents for our Opposition.

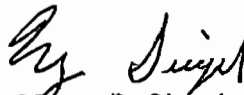
In addition, the undersigned will be away for the last two weeks of August on a prior planned vacation, adding to the difficulties of preparing the Opposition under the current briefing schedule.

We do not believe that Defendants will be unduly prejudiced by this delay. The great majority of the funds in question were attached in March of 2008, five months prior to their motion. Defendants clearly had a great deal of time to obtain supporting declarations and prepare their submission. Plaintiff requests that it have until September 12, 2008 so that it may adequately respond given the circumstances.



When contacted, Defendants' counsel informed us that he objects to our request as he believes that his clients would be prejudiced since their funds are currently attached under the contested attachment order. Should your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court. We thank your Honor for consideration of this request. This is Plaintiff's first request for an extension.

Respectfully submitted,


Nancy R. Siegel

Cc: **Via Facsimile 212-626-4120**
Richard Anthony De Palma
Kathryn Mary Ryan
Baker & McKenzie (NY)
1114 Avenue of the Americas
4th Floor
New York, NY 10035
212-626-4590